

## REMARKS

This is intended as a full and complete response to the Office Action dated December 22, 2004, having a shortened statutory period for response set to expire on March 22, 2005. Please reconsider the claims pending in the application for reasons discussed below.

In the specification, the paragraph [0006] has been amended to correct minor editorial problems.

Claims 1 - 34 remain pending in the application. Claims 11 - 34 have been cancelled without prejudice by Applicant. Claims 1 - 10 are rejected. Reconsideration of the rejected claims is requested for reasons presented below.

Claims 1, 2, 6 and 9 are amended to correct matters of form and clarify the invention. These amendments are not presented to distinguish a reference, thus, the claims as amended are entitled to a full range of equivalents if not previously amended to distinguish a reference.

Claims 1 – 10 are rejected under 35 U.S.C. § 112, second paragraph. Claims 1, 2, 6, and 9 have been amended. Withdrawal of the rejection is respectfully requested.

Claims 1 – 10 are rejected under 35 U.S.C. § 102(b or e) as anticipated by or, in the alternative, under 35 U.S.C. 103(a) as obvious over *Chiu, et al.* (U.S. Patent 6,068,544) , *Chokshi, et al.* (U.S. Patent 6,648,730) or *Gill, et al.* (European Publication 0,347,718) . Applicant respectfully traverses the rejections. *Chiu, et al.* and *Chokshi, et al.* do not recite or suggest a surface of the substrate support is adapted to retain a liquid bath. *Gill, et al.* recites spraying the substrate, but does not retain a liquid bath. Therefore, *Chiu, et al.*, *Chokshi, et al.*, and *Gill, et al.* alone or in combination, do not teach, show, or suggest a substrate support adapted to transfer a substrate to a polishing head along a central axis wherein a surface of the substrate support is adapted to retain a liquid bath thereon, and a first actuator coupled to the substrate support and adapted to move the substrate support laterally to the central axis, as recited in claim 1, and claims dependent thereon. Withdrawal of the rejection is respectfully requested.

In conclusion, the references cited by the Examiner, alone or in combination, do not teach, show, or suggest the invention as claimed.

Having addressed all issues set out in the office action, Applicant respectfully submits that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



---

Brian K. Hrna  
Registration No. 41,852  
MOSER, PATTERSON & SHERIDAN, L.L.P.  
3040 Post Oak Blvd. Suite 1500  
Houston, TX 77056  
Telephone: (713) 623-4844  
Facsimile: (713) 623-4846  
Attorney for Applicant(s)